

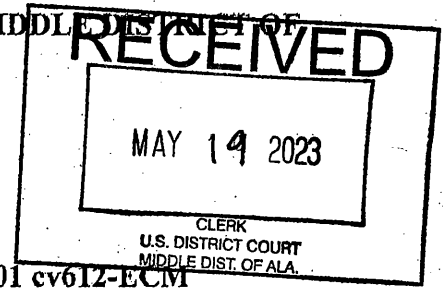
IN THE UNITED STATES DISTRICT COURT OF FOR THE MIDDLE DISTRICT OF
ALABAMA

Christopher Barbour

V.

John Hamm, Commissioner, Alabama
Department of Corrections, et. Al.,

CASE NUMBER: 2:01 cv612-ECM



MOTION TO QUASH ORDER TO APPEAR (SUBPOENA)

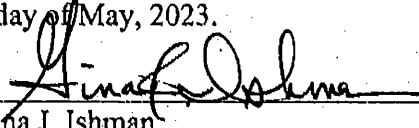
Comes now Gina J. Ishman Circuit Clerk, Montgomery County, who files this Motion to Quash the Order to Appear (Subpoena) issued to her in the above-styled action.

As grounds for this motion, I, Gina J. Ishman, respectfully request that the court grant my Motion to Quash the Order to Appear (Subpoena) for the following:

1. I have been ordered to produce and permit inspection of documents, information, or objects of any and all juvenile records to the investigations or prosecutions of Jerry Tyrone Jackson, born in 1975 by May 17, 2023, at 5:00 p.m. via email to miriam.gohara@ylsclinics.org.
2. Any records, reports, and information concerning juveniles in which I may be asked to produce are considered confidential pursuant to Section 12-15-133, Ala. Code 1975, and may require "disclosure of privileged or other protected matter and no exception or waiver applies" pursuant to Rule 45(c)(3)(A)(iii), Alabama Rules of Civil Procedure.

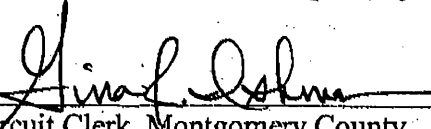
WHEREFORE, THE PREMISES CONSIDERED, I request this Honorable Court to grant the motion to quash.

Respectfully submitted on this 16th day of May, 2023.


Gina J. Ishman
Circuit Clerk, Montgomery County
251 South Lawrence Street
Montgomery, AL 36104

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Motion to Quash the Order to Appear (Subpoena) on this 16th day of May, 2023 to Miriam Gohara, Esquire, by emailing a copy to miriam.gohara@ylsclinics.org.


Gina J. Ishman
Circuit Clerk, Montgomery County